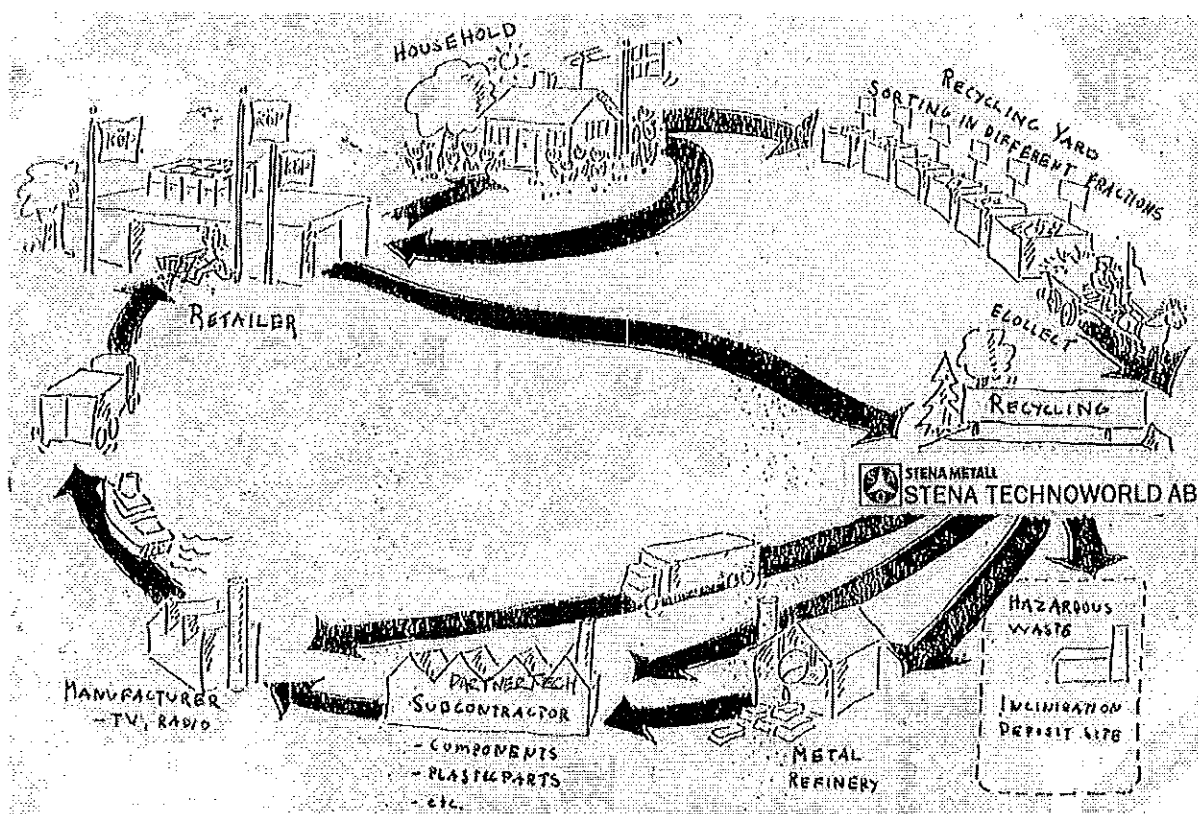


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## Transfer of information available for new EEE-products put on the markets to the WEEE-Recycling Industry.

The recycling business Stena Technoworld is mainly driven by a legal frame work and the WEEE-directive ( 2002/96/EG) is the base. It stipulates certain % of a product category to be material recycled and reused this regardless to what material it contains. Many studies show that energy saving is high when using recycled material. The below picture is well know as simple description of how recycling is working. Besides bringing material back to new products we produce energy, but also take out Hazardous waste to secure that the material can be recycled. Hazardous Waste is material that is sometimes is phased out. It is normally substances that society no longer accepts in new products.



The recycling service provided is a mix of down stream solution which supports the demands in WEEE directive as well as other legislation in the waste field.

The need for the service will be there as soon as somebody purchase electric or electronic product. There are 3 important basic things that must be kept in mind when analyzing the picture.

- the different stakeholder can be in different parts of the world
- it can be a long time span from the point a product is manufactured until it becomes a waste.
- Over time new knowledge arise of the impact that substances/metals pose on health and environment. This new knowledge decides if the substances/metals shall be phased out or be put back into products in the waste stage.

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**Need for the RIGHT information at the RIGHT time at the RIGHT place.**

Information exists on what's in a product. There are safety data sheets. Producers have information on their home page. Reports are constantly being produced. The level of detail in the information is either too high or too low to support us as a recycler to improve existing processes or investing in more resource efficient processes (eg lacking information in old SDS regarding substances or too detailed technical manufacturing data on a specific model from a specific producer)

Also, the timing of the information is lacking, in many cases it is either too late to react or too early to comprehend the information, because of its complexity. Sometimes information is lacking. WEEE is sometimes old. The information is not available. Or the information is not trustworthy, because new knowledge is available.

With the right information, at the right time at the right place, we as a recycler can be an active/improved partner in supplying material to the manufacturers, rather than virgin material is being used. At the same time build up the right phase of processes.

One reason for this situation is that the legislation on waste and new products has different demands when it comes to substance declaration or control.

REACH could help us in this context but when now following its development this seems not to be the case.

- 1) ECHA has a definition on the 0,1% declaration on SVHC ( to be on the weight of a complete article)
- 2) Looking at the definition who in the Supply chain or users that can demand information, the recycler is not clearly included.

This 0, 1% definition is really a contradiction to the ROHS-directive which defines it levels (0, 1% and 0, 01%) on homogenous material

Why this contradiction not support efficient resource management becomes very clear when considering the impact from proposals on revised POPs regulation. Here very specific substances is addressed and where limits (whether a material are aloud to be material recycled or not) are between 10 to 100 times lower that what is demanded on SVHC in new products. At the moment the POPs substances and SVHC may not be the same substances BUT since they substances are defined as SVHC in new products they are not likely to be less of concern when they end up in the waste stream.

The situation gets even more complicated since the WEEE directive (article 11) stipulates a producer to supply us with all the information needed to fulfill the rest of the articles in the WEEE directive.

The examples above are only focused on the dangerous aspect in a substance. We would very much underline that the need of information covers also if substance/material/metals etc is not covered by the above legislation.

**Proposal to a first step of improving the REACH and ROHS connection to recycling.**

- Substances covered by the ROHS-directive (even if they are under the limit) and
- Substance defined by REACH as SVHC or put on the Candidate list

shall as a minimum be available to an authorized WEEE-recycler. The format shall be the already stipulated one according to REACH and ROHS. The recycler shall be identified as a part of an extended supply chain which means that information shall be available already when a product is put on market. This communication platform could be the same as a producer have with its material/component supplier.

Doing like this is in the first step we add NO EXTRA WORK for the producer

Doing like this gives a much better position when at the same time bring wanted resources back into the society, and phasing out not wanted. Both ways need the right information at the right time at the right place to get minimal negative impact on environment and human health.

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